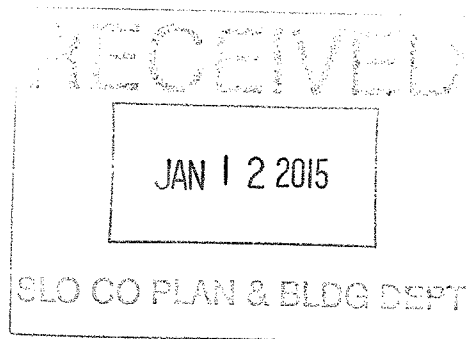




Air Pollution Control District  
San Luis Obispo County



January 9, 2015

Xzandrea Fowler  
San Luis Obispo County Department of Planning and Building  
County Government Center  
San Luis Obispo, CA 93401

SUBJECT: APCD Comments Regarding the Hanson Aggregates Mid-Pacific Santa Margarita Quarry Expansion (DRC2011-00098/DRC2011-00099), Draft Environmental Impact Report (Draft EIR)

Dear Ms. Fowler,

Thank you for including the San Luis Obispo County Air Pollution Control District (APCD) in the environmental review process. We have completed our review of the Draft EIR for the proposed project located at 16815 El Camino Real in Santa Margarita. Hanson Aggregates is applying for a modification to an existing Conditional Use Permit (CUP) and Reclamation Plan Amendment (RPA), which would result in an extension to the existing quarry operations, known as the Santa Margarita Quarry (State Mine ID 91-40-003). The project will extend the life of the reserves at the quarry by adding approximately 41 acres to the current permitted boundary, for a total of approximately 126 acres.

*The following are APCD comments that are pertinent to this project.*

#### GENERAL COMMENTS

As a commenting agency in the California Environmental Quality Act (CEQA) review process for a project, the APCD assesses air pollution impacts from both the construction and operational phases of a project, with separate significant thresholds for each. The APCD assessed this project by assuming all emissions are from the operational phase. **Please address the action items contained in this letter with special attention to items that are highlighted by bold and underlined text.**

#### GENERAL COMMENT:

##### Air Quality Impact Analysis

The project proponent provided an analysis of the project greenhouse gas (GHG) impacts which included assumptions for the emission calculations (such as on and off road equipment description, usage and trip information). The CalEEMod model was used to estimate GHG. CalEEMod calculates criteria pollutants as well as GHG. In the report, CalEEMod printouts have blank spaces where the criteria pollutant values are typically located. CalEEMod calculates and tabulates both criteria and GHG emissions, so the criteria pollutant data appears to have been deleted. As stated in the APCD

letter dated July 22, 2013, **the APCD recommends that the criteria pollutants of the expansion project be included in the EIR.** This will allow full public review and disclosure of project emissions.

Again, thank you for the opportunity to comment on this proposal. If you have any questions or comments, feel free to contact me at 781-5912.

Sincerely,



Gary Arcemont  
Air Quality Specialist

GJA/lmg

cc: Tim Fuhs, Enforcement Division, APCD  
Gary Willey, Engineering Division, APCD

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